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REC'D JAN 12 1990

MORSESHOE, INC. 555 Turnpike Street, Canton, MA 02121, 617 828-9300, Telex 92 4469, Cable Address "Morseshoe"

Executive Offices

January 9, 1990



SDMS DocID 559601

**STEPHEN J. CALDER, REMEDIAL PROJECT MANAGER**  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
P.O. Box 5988  
JFK Station  
Boston, MA 02114

Superfund Records Center  
SITE: Coakley  
BREAK: 11.9  
OTHER: 559601

RE: Coakley Landfill Superfund Site, North Hampton, New Hampshire

Dear Mr. Calder:

Enclosed please find our response to request for information in connection to the above-referenced matter. As you can see from our response to that letter, that letter was addressed to our retail store in Seabrook, New Hampshire. Although Morse specifically dealt with in our response, your will note that as a retail store, we have no reason to believe that we have any connection whatsoever with the Coakley Landfill Site.

If you need any further information, please do not hesitate to contact me directly.

Sincerely yours,

Thomas J. Raubach  
Counsel

TJR/lm  
enclosures

RESPONSE TO REQUESTS RELATING TO COAKLEY LANDFILL

1. These requests have been answered by Thomas J. Raubach, counsel for Morse Shoe, Inc., 555 Turnpike Street, Canton, Ma. 02021.
- 2-7. Unless otherwise noted, all questions were answered by me in my position as Counsel for Morse Shoe, Inc.
8. I note that the Request was sent to our Fayva Shoe store at the Seabrook Southgate Shopping Center. Fayva Shoes is a division of Morse Shoe, Inc. The name of our company is: Morse Shoe, Inc., 555 Turnpike Street, Canton, MA 02021. The current President and Chairman of the Board of Directors is Manuel Rosenberg.
9. Morse Shoe, Inc., is a wholly owned subsidiary of Moacq Holdings Corporation. This situation has existed since May 27, 1987. The President and Chairman of the Board of Moacq Holdings Corporation is Manuel Rosenberg.
10. Morse Shoe, Inc., is incorporated in Delaware and the agency for service is The Prentice Hall Corporation System, Inc. Moacq Holdings Corporation is incorporated in Delaware and the agency for service is CT Corporation.
11. Morse Shoe, Inc. is primarily engaged in the retail sale of footwear. Our two retail outlets are the chain of shoe stores known as Fayva shoes and departments within various department stores that we operate under the terms of various license agreements.
12. Based on other responses to the requests given herein, it is our belief that this information is not needed. Further information will be supplied if required.
13. Based on other responses to the requests given herein, it is our belief that this information is not needed. Further information will be supplied if required.
14. Because we operate a retail shoe store at the location, the answer to this question is no.
15. Because we operate a retail shoe store at the location, the answer to this question is no.

REQUESTSGENERAL INFORMATION

1. Identify the person(s) answering these Requests on behalf of the Respondent.
2. For each and every Request contained herein, identify all persons consulted in the preparation of the answer.
3. For each and every Request contained herein, identify all documents consulted, examined or referred to in the preparation of the answer and provide true and accurate copies of all such documents.
4. If you have a reason to believe that there may be persons able to provide a more detailed or complete response to any Request contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
5. Identify all persons, including Respondent's employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal or other handling of materials at, or transportation of materials to the Site.
6. For each and every Request contained herein, if information responsive to this Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained.
7. If you have answered any of these requests in a previous Information Request letter, please specify the date of the letter and the request to which you have responded relevant to Coakley Landfill.

FINANCIAL/CORPORATE INFORMATION

8. Please state the correct legal name of your town, company, agency or business. For towns, provide the name and address of the current primary officer or town manager of your town. For companies, provide the name and address of the current president and chairman of the board of directors of your company. Additionally, please state any other names by which your company has been known.
9. If the company is or was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the name and address of that corporation president and chairman of the board and other officers.

10. Identify the state of incorporation and the agency for service of all companies identified in response to Requests 8 and 9 above. For towns, also include all notice requirements for suits against the town.
11. Please state the nature of your company's business and briefly describe its operation.
12. Identify all liability insurance policies held by Respondent from 1960 to the present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden or both types of accidents.
13. Identify all Respondent's current assets and liabilities and current net worth.

GENERATOR/TRANSPORTER INFORMATION

14. Have you or any person working with you or on your behalf ever accepted materials (hazardous and non-hazardous) for transportation to the Site from any person? If the answer to this question is anything but an unequivocal no, identify:
  - a. All persons, including you, from whom you or such other persons accepted materials for transportation to the Site.
  - b. In general terms, the nature and quantity of all nonhazardous materials accepted for transportation to the Site.
  - c. The nature of the hazardous materials accepted for transportation to the Site including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process which generated the material.
  - d. The persons from whom you accepted hazardous materials.
  - e. Every date on which you transported hazardous materials to the Site.
  - f. The owners of the hazardous materials that were accepted for transportation.
  - g. The quantity (weight and volume) of hazardous materials brought to the Site.
  - h. All tests, analyses, analytical results and manifests concerning each hazardous material accepted for transportation to the Site.

- i. The precise location(s) at the Site to which each hazardous material was transported.
  - j. The persons who selected the location to which you would take each hazardous material. Where such persons intended to have the hazardous materials involved in each arrangement treated or disposed of and all evidence of their intent.
  - k. Who selected the Site as the location to which you would take each hazardous material.
  - l. The amount you were paid for accepting the hazardous materials for transportation, the method of payment and the identity of the persons who paid.
  - m. The amount you paid to dispose of the material at the Site, the method of payment and the identity of all persons whom you paid. Please provide copies of all contracts or agreements you have had with the City of Portsmouth, NH.
  - n. All sites at which such hazardous materials were transshipped through, or were stored or held at, prior to their final treatment or disposal.
  - o. What was done to the hazardous materials after they were transported to the Site.
  - p. The final disposition of each of the hazardous materials brought to the Site.
  - q. The markings on, type and number of containers in which the hazardous materials were contained when they were accepted and when they were left at the Site.
  - r. The number(s) assigned to your particular company by the City of Portsmouth. Review of previous weight slips issued to users of the Coakley Landfill specified a number in the upper left-hand corner, which we believe refers to a permit number. In addition, if you have a list of any or all other users of the landfill with or without assigned permit numbers, please provide that information also.
15. Has your company arranged for disposal or treatment, or transportation for disposal or treatment, of hazardous substances to the Site? If the answer to this question is anything but an unequivocal no, identify:
- a. All persons, including you, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials at or to the Site (or any transshipment site).

- b. The persons with whom you made such arrangements.
- c. Every date on which each of you made such arrangements.
- d. The nature, including the chemical content, characteristic, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous materials involved in each such arrangement.
- e. In general terms, the nature and quantity of non-hazardous materials involved in each such arrangement.
- f. The owner of the hazardous materials involved in each such arrangement.
- g. All tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions.
- h. The precise locations at which each hazardous material involved in such transactions actually was disposed or treated.
- i. Who selected the location to which the hazardous materials were to be disposed or treated.
- j. Who selected the Site as the location at which hazardous materials were to be disposed or treated.
- k. The amount paid in connection with each such arrangement, the method of payment and the identity of the persons involved in each arrangement.
- l. Where the persons identified in "h" above intended to have the hazardous materials involved in each arrangement treated or disposed and all evidence of their intent.
- m. All intermediate sites to which the hazardous materials involved in each arrangement were transshipped, or at which they were stored or held, any time prior to final treatment or disposal.
- n. What was done to the hazardous materials once they were brought to the Site.
- o. The final disposition of each of the hazardous materials involved in each arrangement.
- p. The measures taken by you to determine how and where treatment or disposal of the hazardous materials involved in each arrangement would actually take place.

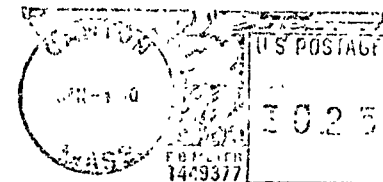
- q. The markings on and type, condition and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment.
- r. The number(s) assigned to your particular company by the City of Portsmouth. Review of previous weight slips issued to users of the Coakley Landfill specified a number in the upper left-hand corner, which we believe refers to a permit number. In addition, if you have a list of any or all other users of the landfill with or without assigned permit numbers, please provide that information also.

Thomas J. Raubach

MORSE SHOE, INC.

555 Turnpike Street  
Canton,  
Massachusetts 02021

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